



Eric Gonzalez
District Attorney

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: JOEL ESPINOSA

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS ESPINOSA IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTION(S):

1. CARLOS OYOLA V. CITY OF NEW YORK, ET AL, 11-CV-130, FILED IN THE SOUTHERN DISTRICT OF NEW YORK

Disclosure # 2 (PENDING):

THE FOLLOWING ALLEGATIONS, DATED 12/21/2020, ARE PENDING AGAINST MOS ESPINOSA:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County